



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

September 16, 2015

Ms. Susan Hedman  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Re: Preliminary Recommendations Concerning  
Round 2 Air Quality Designations for the  
2010 Primary 1-Hour Sulfur Dioxide  
National Ambient Air Quality Standard

Dear Ms. Hedman:

This letter is in response to the United States Environmental Protection Agency's (U.S. EPA's) March 20, 2015 updated guidance concerning air quality designations for the 2010 primary 1-hour sulfur dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS).

On March 2, 2015, the U.S. District Court for the Northern District of California accepted an enforceable order agreement (Consent Decree) between U.S. EPA, the Sierra Club, and the Natural Resources Defense Council to resolve litigation concerning deadlines for completing 1-hour SO<sub>2</sub> NAAQS air quality designations for the remainder of the country. U.S. EPA must complete remaining designations in three additional rounds: Round 2 by July 2, 2016, Round 3 by December 31, 2017, and Round 4 by December 31, 2020. U.S. EPA will complete these designations by designating areas as either nonattainment, attainment, or unclassifiable.

The court order directs U.S. EPA to designate two groups of areas under Round 2 air quality designations for the 2010 primary 1-hour SO<sub>2</sub> NAAQS: (1) areas that have current monitored design values in violation of the NAAQS that were not previously designated during Round 1 designations and (2) areas that contain any stationary source(s) that, according to U.S. EPA's Air Quality Markets Database either emitted more than 16,000 tons of SO<sub>2</sub> in 2012 or emitted more than 2,600 tons of SO<sub>2</sub> and had an annual average emission rate of at least 0.45 lbs SO<sub>2</sub>/MMBtu (pounds per one million British thermal units) in 2012 and that has not been announced (as of March 2, 2015) for retirement.

U.S. EPA identified the following five coal-fired electric power plants in Indiana as meeting Round 2 criteria established in the Consent Decree:

<b>County</b>	<b>Facility Name</b>	<b>2012 SO<sub>2</sub> Emissions (tons)</b>	<b>2012 SO<sub>2</sub> Emissions Rate (lbs/MMBtu)</b>
Spencer	Rockport Generating Station	54,390	0.583
Jefferson	Clifty Creek Generating Station	52,839	1.767
Gibson	Gibson Generating Station	22,447	0.249
LaPorte	Michigan City Generating Station	11,584	1.006
Posey	A.B. Brown Generating Station	7,091	0.521

U.S. EPA is providing states the opportunity to submit updated recommendations and supporting information for consideration for the affected areas. The guidance indicates U.S. EPA's intention to propose state designations on or about February 3, 2016, and finalize them by July 2, 2016. As such, the guidance requests that states submit their recommendations for area designations by September 18, 2015.

Enclosed you will find Indiana's assessment to support final boundary determinations for Round 2 designations for the 2010 primary 1-hour SO<sub>2</sub> NAAQS (Enclosure 3). Indiana has also enclosed quality-assured ambient air quality monitoring data from 2012-2014 for Indiana's SO<sub>2</sub> monitoring network (Enclosure 2). Based on this data, there are no new areas in the state that monitored concentrations above the standard in addition to those identified in Round 1 air quality designations.

The following enclosures are included with this letter:

- Enclosure 1 Indiana's Preliminary Designation Recommendations Concerning Round 2 Air Quality Designation Recommendations for the 2010 Primary 1-Hour SO<sub>2</sub> Standard
- Enclosure 2 Indiana's 2012-2014 SO<sub>2</sub> Monitoring Data Summary Compared to the 1-Hour Standard
- Enclosure 3 Indiana's Assessment of Round 2 Air Quality Designations for the 2010 Primary 1-Hour SO<sub>2</sub> Standard

Indiana is recommending that U.S. EPA use county boundaries for the purposes of providing a clearly defined legal boundary for carrying out the air quality planning and enforcement functions for the area.

Based on the results of this evaluation, Indiana is recommending Gibson, Jefferson, LaPorte, Posey, and Spencer counties be designated as attainment under the 2010 1-hour primary SO<sub>2</sub> standard. This recommendation is based on the fact that Indiana's assessment, performed in accordance with U.S. EPA's "Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standards" dated March 20, 2015 and draft SO<sub>2</sub> NAAQS Designations Modeling Technical Assistance Document guidance dated December 2013, clearly demonstrates that these facilities, based on 2012-2014 quality-assured ambient air quality monitoring data and ambient air quality modeling, are not located in an area currently violating the NAAQS or are causing or contributing to a monitored violation of the standard.

An electronic version of this request in PDF format, as well as a disk containing input and output files used to conduct appropriate air dispersion modeling analyses to support Indiana's assessment have been sent to Randy Robinson and John Summerhays of U.S. EPA Region 5.

Indiana reserves the right to supplement and/or revise the recommendations contained herein as additional monitoring and/or modeling information becomes available. I would like to thank you for this opportunity to provide feedback to U.S. EPA regarding Round 2 air quality designations for the 2010 primary 1-hour SO<sub>2</sub> NAAQS. We look forward to working with your staff as U.S. EPA moves forward with the designations process. If you have any questions regarding Indiana's designation recommendations, please feel free to contact me at (317) 232-8611 or by email at [ccomer@idem.IN.gov](mailto:ccomer@idem.IN.gov) or Keith Baugues, Assistant Commissioner, Office of Air Quality, at (317) 232-8222 or by e-mail at [kbaugues@idem.IN.gov](mailto:kbaugues@idem.IN.gov).

Sincerely,



Carol S. Comer  
Commissioner

CSC/kb/sd/bc/gf  
Attachments:

cc: George Czerniak, U.S. EPA Region 5 (no enclosure)  
Chris Panos, U.S. EPA Region 5 (no enclosure)  
Randy Robinson, U.S. EPA Region 5 (no enclosure)  
John Summerhays, U.S. EPA Region 5 (no enclosure)  
Doug Aburano, U.S. EPA Region 5 (no enclosure)  
Keith Baugues, IDEM-OAQ (no enclosure)  
Scott Deloney, IDEM-OAQ (no enclosure)  
Brian Callahan, IDEM-OAQ (w/ enclosure)  
Mark Derf, IDEM-OAQ (w/ enclosure)  
Gale Ferris, IDEM-OAQ (w/ enclosure)  
File Copy

